## Exhibit 25:

Morris Deposition Transcript, pages 140-159



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# Transcript of the Testimony of **Morris, Narcisa**

**Date:** January 25, 2023 **Volume:** 

Case: JOHN DOES A, et al. v. GRETCHEN WHITMER, et al.

Printed On: February 10, 2023

		_	
1	they move interstate, correct?	1	federal government?
2	A. Yes.	2	A. No, not to my knowledge.
3	Q. How do they fulfill that registration obligation?	3	Q. Would they be removed from the national registry?
4	A. In our state, we have state statute to support that	4	A. Yes.
5	registration requirement.	5	Q. How does that happen?
6	Q. So they have to register under the state registration	6	A. It's automatic, behind the scenes.
7	system, correct?	7	Q. So let's take after the 2020 law changes, there were
8	A. Correct.	8	individuals who were under the Holmes Youthful Trainee
9	Q. There's not like a federal registry that they can	9	Act. Are you familiar with the Holmes Youthful
10		10	Trainee Act?
11	register in?  A. Not to my knowledge, no.	11	A. Yes.
12	Q. Okay. I saw some references to the NSOR database,	12	Q. And some of those individuals came off the registry
13	what is that?	13	after the 2021 law changes, correct?
14	A. I'm sorry, I need more content.	14	-
15		15	A. I wasn't a participant, so.
	Q. I've seen some references in the documents to a National Sex Offender Registry database. Are you	16	Q. You weren't personally involved in removing
16		1	individuals?
17	familiar with what that is?  A. Can you expend more? Was there more with that? It's	17 18	A. Correct. I know something happened, I just don't know
18	A. Can you expand more? Was there more with that? It's	19	the reason or the details around it.
19	not bringing anything to my recall.	20	Q. Okay. Sure. Are you did you but you're aware
20	Okay. I'll maybe on a break see if I can find a document.	20	that there were people that were removed as a result of the 2021 law changes around HYTA?
21		1	
22	A. Okay.	22	A. I know that there were people removed regarding HYTA.
23	Q. So if somebody is removed from the registry in	23	Q. Okay. Would those individuals then also come off the
24	Michigan, maybe there's a court order that they get	24	federal registry?
25	removed, do you communicate that in any way to the	25	<b>A.</b> They would come they if they come off our
	Page 137		Page 138
1	and the standard of the military National	,	O Laboritoria and of state officers which is bind
1	registry, they come off the public's National	1 2	Q. Let's talk about out-of-state offenses, which is kind
2	Public Sex Offender Registry.	3	of confusing, at least to me. I'm hoping you can help
3 4	Q. Okay. Let's say that that person still has a person who's under the Holmes Youthful Trainee Act	4	me understand it. Can you explain how you determine
4	person who's under the fromles Touthful Trainee Act	1 4	the registration requirements for morals with
	atill has an abligation to register under federal law	1	the registration requirements for people with
5	still has an obligation to register under federal law,	5	out-of-state offenses?
6	how would the person do that?	5 6	out-of-state offenses?  A. If it's an out-of-state offense that we've encountered
6 7	how would the person do that? <b>A.</b> I don't know.	5 6 7	out-of-state offenses?  A. If it's an out-of-state offense that we've encountered before, legal has already provided guidance on what
6 7 8	how would the person do that?  A. I don't know.  MR. JAMISON: Objection, lack of	5 6 7 8	out-of-state offenses?  A. If it's an out-of-state offense that we've encountered before, legal has already provided guidance on what the tier should be, they're already in our system. If
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1 in policy applicability of when we use our duration 1 the -- if -- it doesn't matter if it's comparable to a 2 versus the state's duration because the language in 2 Michigan offense; if the convicting jurisdiction 3 3 statute. And so, this helped us determine that. requires registration, you have to register, correct? 4 Q. Can you explain that. I'm sorry, go ahead. 4 A. Say that again. 5 5 A. So there are --Q. If the convicting jurisdiction requires registration, Q. Go ahead. 6 6 the person has to register in Michigan even if it's 7 7 not comparable to a Michigan conviction? A. So there is -- it -- this essentially helps us 8 8 **A.** So one way or the other, yeah, if their jurisdiction determine whether we're using our state duration based 9 on that conviction or if -- that similar conviction or 9 requires them to register, they would have to 10 if it would have been their state duration. And 10 register. 11 again, these are for convictions that have already 11 Q. So, for example, if you had indecent exposure, that's 12 been identified in the system. 12 not a registrable offense in Michigan. If it's a 13 registrable offense in, I don't know, Georgia, the Q. Okay. So let me make sure, because it's a -- to me 13 14 it's a confusing flowchart -- make sure I'm person would still have to register in Michigan? 14 15 understanding you correctly. 15 16 So if someone has an offense that's not 16 Q. Okay. Okay. So let's say the convicting -- the 17 comparable to Michigan registration statute, so we're 17 offense -- excuse me. Let's say -- well, let's say the convicting 18 here on this first box, go no, okay. They still have 18 to register if the state requires -- if their state of 19 state doesn't require registration -- a comparable --19 20 20 I found this chart very confusing. conviction requires registration, correct? 21 21 If it's comparable to a Michigan adult A. If their state of conviction requires registration, 22 22 conviction, but the state -- convicting state doesn't 23 Q. So you could have -- if the -- if the state of 23 require registration, would the person have to 2.4 registration -- it doesn't matter if comparable to a 2.4 register? 25 Michigan offense if the state of registration -- if 25 A. Say that again, I'm sorry. Page 141 Page 142 Q. So let's take an offense that the convicting state 1 A. Correct. 2 doesn't require registration. But if comparable to a 2 Q. While you were manager? 3 Michigan offense, as I read this looking at this top 3 A. Correct. 4 line along the flowchart, it looks like they would --Q. Was there a memo or directive or written guidance of 4 5 they could still have to register in Michigan? 5 any kind about that durational change? 6 A. They could, yes. 6 A. Received communication, I believe, I don't know if it 7 Q. Okay. And so, let's take someone who is -- who has --7 was formal or it was just a change in process of what that's an offense that's comparable to a Michigan 8 8 we've been doing. And so, then we were told we were 9 conviction, but it's not a tier III offense. It's 9 supposed to do it this way. But it was new to us so 10 10 tier I or tier II offense. As I read this chart, the we needed to somehow write it down to keep track of 11 11 registration duration would be whichever is longer, 12 the convicting state or Michigan, is that correct? 12 Q. Who made that decision to change the durational 13 13 requirements? A. MSP legal. 14 Q. Let's go on to the next page for out-of-state juvenile 14 15 adjudications. Can you sort of summarize how juvenile 15 Q. Okay. 16 adjudications are handled for out of state? 16 MS. AUKERMAN: We're going to want whatever 17 A. Let me think about this for a minute. So again, this 17 communications or directive was provided to the staff. BY MS. AUKERMAN: 18 is trying to figure out -- because we had that change 18 19 where we could go on either duration. This was 19 Q. If I'm understanding this chart -- this flowchart correctly, if it's not comparable to a Michigan 2.0 helping us identify the duration, when to use our 20 21 duration requirements or the other state's. 21 juvenile adjudication, the person still has to 2.2 Q. When you mentioned we had that change about duration, 22 register if the adjudicating state requires 23 23 registration, correct? when was that? 24 A. I don't know off the top of my head. 24 A. Correct. 25 25 Q. Was it while you were in the unit? Q. If the adjudicating state requires registration of, I Page 143 Page 144

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don't know, some offense that we don't consider an offense here, a juvenile would still —if the jumine has to register in the other sate, they'd still have to register in Michigan juvenile adjudication and in Michigan —a Michigan juvenile and the person is under thirteen, the person would and the person is under thirteen, the person would still —at the person would still be required to register in Michigan, correct?  4. Correct.  4. Correct.  4. Correct.  4. Correct.  5. O. Chay. We received a bunch of documents that were communications with MSP legal about trying to figure out whether certain offenses were comparable to Michigan offenses. When is legal brought in to those decisions?  4. If it's an offense were encountered before, so would have to register in Michigan?  5. A. Correct.  5. O. Correct.  6. O. Neay. But if the —if the offense is not a tier III, if it's a tier I or tier II, but the adjudication, they responsibly the person would still —at the requires registration, the person would still —at the requires registration, the person would still —at ver to register in Michigan?  5. A. Correct.  6. O. Neay. But if the —if the offense is not a tier III, if it's a tier I or tier II, but the adjudication; they response to the offense is not a tier III, if it's a tier I or tier II, but the adjudication in the person would still —at very one will you ask the question again.  6. O. So –yeah. So when you encounter an offense that you have to register in Michigan offense.  7. O. So –yeah. So when you encounter an offense that you have the recompanable to a Michigan offense?  8. A. Gorrect.  9. O. So –yeah. So when you encounter an offense that you have the recompanable to a Michigan offense?  9. O. So –yeah. So when you encounter an offense that you have the recompan	r			
offense here, a juvenile would still — if the juvenile has to register in the other state, they'd still have to register in Michigan?  A. Correct.  A. Correct.  O. Okay. If it is comparable to a Michigan juvenile adjudication and in Michigan — a Michigan juvenile only registers if they're over fourteen, correct?  A. Correct.  O. But if the adjudicating state requires registration and the person is under thirree, the person would still and the person is under thirree, the person would still to register in Georgia for juvenile adjudication, they would have to register in Michigan?  A. Correct.  O. A. Correct.  O. So wy If it is comparable to a Michigan juvenile only registers if they're over fourteen, correct?  A. Correct.  O. But if the adjudicating state requires registration and the person is under thirree, the person would still to register in Georgia for juvenile adjudication, they would have to register in Michigan?  A. Correct.  O. Okay. But if the —if the offense is not a tier III, the the adjudicating state requires registration, the person would still a have to register in Michigan?  D. So — yeah. So when you encounter an offense that you have not register in Michigan?  D. So — yeah. So when you encounter an offense that you have not register in Michigan.  Page 145  D. So — yeah. So when you encounter an offense that you have not register of the person would still a ferror of the person would still a ferro	1	don't know some offense that we don't consider on	1	compat
a juvenile has to register in the other state, they'd still have to register in Michigan?  A. Correct.  O. Okay. If it is comparable to a Michigan juvenile adjudication and in Michigan – a Michigan juvenile only registers if they're over fourteen, correct?  A. Correct.  D. O. But if the adjudicating state requires registration and the person is under thireen, the person would still be required to register in Michigan.  A. Correct.  A. Correct.				
still have to register in Michigan?  A. Correct.  Q. Okay. If it is comparable to a Michigan juvenile adjudication and in Michigan – a Michigan juvenile adjudication and in Michigan – a Michigan juvenile and pregisters if they're over fourteen, correct?  A. Correct.  Q. But if the adjudicating state requires registration and the person is under thirteen, the person would still he required to register in Michigan, correct?  A. Correct.  Q. So if you had an eight-year-old that was required to register in Georgia for juvenile adjudication, they would have to register in Michigan.  A. Correct.  Q. So if you had an eight-year-old that was required to register in Michigan offenses. When is legal brought in to those decisions?  A. Correct.  A. Correct.  A. Correct.  Q. And in Michigan only tier III offense require and in Michigan offense we've never encountered before, so it's not already captured, then we would move that on up the chain of - to MSP legal. Or if or some reason it just isn't making sense to us or we just don't feel comfortable or we feel there's something questionable about the situation, then we would pass that to legal.  Q. And in Michigan offense in Michigan.  A. Correct.  Q. And in Michigan offense in or it is III.  22 if it's a tier I or tier III, but the adjudicating state requires registration, the person would still as have to register in Michigan.  Page 145  A. Correct.  Page 145  A. Correct.  1 foundation.  Page 145  A. Correct.  Q. So — yeah. So when you encounter an offense that you of the whether it's comparable to a Michigan offense is?  A. Correct.  Q. So — yeah. So when you encounter an offense that you of the whether it's comparable to a Michigan offense of different stay by the chain of the pression and the person would stall and the person would send it to legal to review. We don't determine that we don't determine that the control of the convicting documentation, police reports?  A. Correct.  Q. So what kind of documents do you get in order for legal to review. We don't determine th				•
5 A. Correct. 6 Q. Okay. If it is comparable to a Michigan juvenile adjudication and in Michigan — a Michigan juvenile only registers if they're over fourteen, correct? 9 A. Correct. 10 Q. But if the adjudicating state requires registration and the person is under thirteen, the person would still be required to register in Michigan, correct? 12 at libe required to register in Michigan, correct? 13 A. Correct. 14 Q. So if you had an eight-year-old that was required to register in Georgia for juvenile adjudication, they would have to register in Michigan? 16 A. Correct. 17 A. Correct. This how I understand it. 18 Q. And in Michigan only tier III offenses require registration for juveniles, correct? 19 A. Correct. 10 Q. Okay. But if the — if the offense is not a tier III, if it's a tier I or tier II, but the adjudication? 19 A. Correct. 20 A. Correct. 21 Q. Okay. But if the — if the offense is not a tier III, if it's a tier I or tier II, but the adjudicating? 22 state requires registration, the person would still have to register in Michigan? 23 state requires registration, the person would still have to register in Michigan? 24 A. Correct. 25 PS W.S. AUKERMAN: 26 Q. You can answer. 27 A. Correct. They may still have to register in Michigan. 28 PS W.S. AUKERMAN: 39 Q. You can answer. 4 A. Are you — will you ask the question again. 4 Q. So when you encounter an offense that you haven't encountered before, so different analysts sometimes come to different conclusions about whether it's comparable to a Michigan offense? 10 A. Correct. 11 A. No. Because they don't do that. They're just looking to see if there isn't sometimes come to different conclusions about whether it's comparable to a Michigan offense? 19 A. No. Because they don't do that. They're just looking to see if there isn't sometimes come to different conclusions about whether it's comparable to a Michigan offense? 10 A. No. Because they don't do that. They're just looking to see if there isn't sometimes come to different conclusions about whether it's com				·
6 Q. Okay. If it is comparable to a Michigan juvenile adjudication and in Michigan – a Michigan juvenile only registers if they're over fourteen, correct?  9 A. Correct. 9 A. Correct. 10 Q. But if the adjudicating state requires registration and the person is under thirteen, the person would still be required to register in Michigan, correct? 14 Q. So if you had an eight-year-old that was required to register in Georgia for juvenile adjudication, they would have to register in Michigan? 17 A. Correct. 18 Q. And in Michigan only tier III offenses require registration only tier III offenses require registration for juveniles, correct? 19 A. Correct. 10 Q. So, W. But if the – if the offense is not a tier III, if it's a tier lor tier II, but the adjudicating thave to register in Michigan? 20 A. Correct. They may still have to register in Michigan? 21 G. Okay. But if the – if the offense is not a tier III, and the adjudicating that a person would still have to register in Michigan? 22 Marchael Salar Sala				•
and judication and in Michigan — a Michigan juvenile only registers if they're over fourteen, correct?  A. Our analysts, one of our four analysts. Q. Okay. But if the adjudicating state requires registration state requires registration in the person is under thirteen, the person would still be required to register in Michigan or present in the person is under thirteen, the person would still be required to register in Michigan, correct?  A. Correct.  A. Correct. They how I understand it.  Q. And in Michigan only iter III offenses require registration for juveniles, correct?  A. Correct.  C. Q. Okay. But if the — if the offense is not a tier III, if it's a tier I or it if's tier I or it if's a tier I or it if's tier I or it if's a tier I or it if's a tier I or it if's tier I or it if's a tier I or it if's a tier I or it if's a tier I or it if's tier I or it if's a tier I or it if's a tier I or it if's tier I or it if's a tier I or it if's tier I or it if's a tier I or it if's tier I or it if's a tier I or it if's tier I or it if's a tier I or it if's a tier I or it if's a tier I or it if's tier I or it if's a tier I or it if but the adjudicating at the to register in Michigan?  A. Correct.  D. Okay. Su thir the — if the offense is not a tier III, if's a tier I or it if but the education again.  Page 145  A. Correct.  BYMS. AUKERMAN:  Q. You can analysts have—so exemething the thought and a tier III, if's a tier I or it if's to it or it is not it is not a tier III, if's a tier I or it if's to it if's new one, the question again.  Q. You can analysts have—so meetin			1	•
a only registers if they're over fourteen, correct?  A. Correct.  D. Q. But if the adjudicating state requires registration and the person is under thirteen, the person would still be required to register in Michigan?  A. Correct.  D. A. Correct.  A. Correct.  A. Correct. That's how I understand it.  D. And in Michigan only iter III offense require registration for juveniles, correct?  D. A. Correct.  D. A. Correct.  A. Correct.  A. Correct.  D. A. Correct.  A. Correct. That's how I understand it.  D. And in Michigan only iter III offense require registration for juveniles, correct?  D. And in Michigan only iter III offense require registration for juveniles, correct?  D. A. Correct.  D. Okay. But if the – if the offense is not a tier III, at the to register in Michigan.  Page 145  D. A. Correct.  D. For offenses you haven't encountered before, so different analysts have sometimes have different perspectives on what the comparable Michigan offense is?  D. Corect.  D. Who makes the decision about whether an out-of-state process is equivalent to a juvenile adjudication?  A. Im sorry, can you ask the question again.  D. So –- yeah. So when you encounter an offense that you haven't encounts about whether it's comparable to a Michigan offense.  D. So different conclusions about whether it's comparable to a Michigan offense.  A. No. Because they don't do that. They're just looking to see if there isn's nomething that already – if it is a new one, they go through legal. We don't make those decisions at this level. These are ones that we already had in the system that now we had to apply the new process to.  D. C. Let me make sure I understand this. This chart is – this isn't for – this only relates to ones that are already in the flowchart?  D. Who you get the police reports?  A. Lorrect.  D. Who you get the police reports?  A. Lorrect was of fere and alvays too meacros in	-			
9 A. Correct. 10 Q. But if the adjudicating state requires registration and the person is under thirteen, the person would still be required to register in Michigan, correct? 14 Q. So if you had an eight-year-old that was required to register in Goorgia for juvenile adjudication, they would have to register in Michigan? 17 A. Correct. That's how I understand it. 18 Q. And in Michigan only tier III offenses require registration of universities, or received a fact that the person would study and the tot registration for juveniles, correct? 19 registration for juveniles, correct? 20 A. Correct. 21 Q. Okay. But if the if the offense is not a tier III, if it's a tier I or tier II, but the adjudicating state requires registration, the person would still have to register in Michigan? 22 if it's a tier I or tier II, but the adjudicating state requires registration, the person would still have to register in Michigan? 23 state requires registration, the person would still have to register in Michigan? 24 have to register in Michigan? 25 A. Correct. 26 Pary MS. AUKERMAN: 27 Goundation. 28 PY MS. AUKERMAN: 28 O. You can answer. 4 A. Are you - will you ask the question again. 5 Q. So - yeah. So when you encounter an offense that you haven't conclusions about whether it's comparable to a Michigan offense? 28 offerent conclusions about whether it's comparable to a full of a Michigan offense? 30 it is a new one, they go through legal. We don't make those decisions at this level. These are ones that we those decisions at this level. These are ones that we are ady and in the system that now we had to apply the new process to. 31 (C. Correct.) 32 (C. Correct.) 33 (C. Correct.) 44 (C. Correct.) 45 (C. Correct.) 46 (C. Correct.) 47 (C. Correct.) 48 (C. Correct.) 49 (C. Correct.) 50 (C. Correct.) 51 (C. Correct.) 52 (C. Correct.) 53 (C. Correct.) 54 (C. Correct.) 55 (C. Correct.) 55 (C. Correct.) 56 (C. Correct.) 57 (C. Correct.) 58 (C. Correct.) 59 (C. Correct.) 59 (C. Correct.) 50 (C. Correct.) 51 (C. Correct.) 51 (C. Correct.				_
communications with MSP legal about trying to figure out whether certain offenses were comparable to Michigan offenses. When is legal brought in to those decisions?  A. Correct.  A. Correct.  A. Correct. That's how I understand it.  Q. Nat in Michigan only tier III offenses required to would have to register in Michigan?  A. Correct. That's how I understand it.  Q. And in Michigan only tier III offenses require registration only tier III offenses require registration for juveniles, correct?  Q. Okay, But if the if the offense is not a tier III, if it's a tier I or tier II, but the adjudicating state requires registration, the person would still as a trequires registration, the person would still have to register in Michigan?  A. Correct.  BY MS. AUKERMAN:  D. You can answer.  A. Are you will you ask the question again.  Q. So yeah. So when you encounter an offense that you haven't come across before and you're trying to figure out what whether it's comparable to a Michigan offense, do different analysts sometimes come to different conclusions about whether it's comparable to a Michigan offense, co different condisions about whether it's comparable to a Michigan offense, co if there isn's northering that already - if the orders is northering that already - if the orders is northering that already - if the orders is northering that already - if the orders already in the flowchart?  A. Correct.  Q. Who makes the decision about whether an out-of-state process is equivalent to a juvenile adjudication, the weak of the question again.  A. Correct.  Q. Who makes the decision about whether an out-of-state process is equivalent to a juvenile adjudication, the weak of the question again.  A. Correct.  A. Mr yor on answer.  A. Are you will you ask the question again.  Q. So offerent states show different vays of treating juveniles of - different deferral programs, things like that.  Who makes the decision that say, you know, a Georgia program is comparable to the Holmes Youthul Traine Act?  A. I'll it it'				
and the person is under thirteen, the person would still be required to register in Michigan, correct?  A. Correct.  O. So if you had an eight-year-old that was required to register in Georgia for juvenile adjudication, they would have to register in Michigan only tier III offenses require gistration for juveniles, correct?  A. Correct. That's how I understand it. O. And in Michigan only tier III offenses require gistration for juveniles, correct?  O. Okay. But if the — if the offense is not a tier III, if it's a tier I or tier II, but the adjudicating state requires registration, the person would still have to register in Michigan?  A. Correct. They may still have to register in Michigan,  Page 145  Page 146  A. Correct.  They may still have to register in Michigan  O. So - yeah. So when you encounter an offense that you as the question again.  O. So - yeah. So when you encounter an offense that you different conclusions about whether it's comparable to a Michigan offense, do different analysts have - whether it's comparable to a Michigan offense of there isn't something that already — if to see if there isn't something that already — if to see if there isn't something that already — if to see if there isn't something that already — if to see if there isn't something that already — if the word of the control of the Holmes Youthful fail to see if there isn't something that already — if the may process to.  Q. Let me make sure I understand this. This chart is — this isn't for — this only relates to ones that are already in the flowchart?  A. Correct.  D. We to socretain any conviction documentation, police reports?  A. Correct.  D. We to socretain any conviction documentation, police reports?  A. Correct.  D. We to socretain any conviction documentation, police reports.  D. Who do you get the police reports?  A. Correct.  D. We to socretain any conviction documentation, police reports.  D. Who do you get the police reports?  A. Correct.  D. Who do you get the police reports?  D. We to socretain any conviction do				
12 still be required to register in Michigan, correct? 13 A. Correct. 14 Q. So if you had an eight-year-old that was required to register in Georgia for juvenile adjudication, they would have to register in Michigan? 15 would have to register in Michigan? 16 Q. And in Michigan only tier Ill offenses require registration for juveniles, correct? 19 registration for juveniles, correct? 20 A. Correct. 21 Q. Okay. But if the — if the offense is not a tier III, if it is a tier I or tier II, but the adjudicating state requires registration, the person would still have to register in Michigan? 22 A. Correct. They may still have to register in Michigan. 23 state requires registration, the person would still have to register in Michigan. 24 have to register in Michigan? 25 A. Correct. They may still have to register in Michigan. 26 Page 145  17 Foundation. 28 BYMS. AUKERMAN: 39 Q. You can answer. 4 A. Are you — will you ask the question again. 50 Q. So — yeah. So when you encounter an offense that you haven't come across before and you're trying to figure out what — whether it's comparable to a Michigan offense.? 29 d. A. Orrect. 20 A. Orrect. 30 Q. You can answer. 4 A. Are you — will you ask the question again. 50 Q. So — yeah. So when you encounter an offense that you a Michigan offense.? 51 A. No. Because they don't do that. They'e just looking to see if there isn't something that already — if it's a new one, they go through legal. We don't make those decisions at this level. These are ones that we already had in the system that now we had to apply the new process to. 52 Q. Okay. So then you would say look, it's —				
13   A. Correct.   13   decisions?   14   A. If it's an offense we've never encountered before, so it you had an eight-year-old that was required to be register in Georgia for juvenile adjudication, they would have to register in Michigan?   16   would have to register in Michigan?   17   A. Correct. That's how I understand it.   17   to a And in Michigan only tier III offenses require registration for juveniles, correct?   19   don't feel comfortable or we feel there's something questionable about the situation, then we would pass that to legal.   20   Q. Okay. But if the if the offense is not a tier III, if it's a tier I or tier II, but the adjudicating   22   if it's a tier I or tier II, but the adjudicating   23   state requires registration, the person would still   24   have to register in Michigan?   25   A. Correct.   26   A. Correct.   27   A. Correct.   28   YMS. AUKERMAN:   29   A. Correct.   29   A. Correct.   29   A. Correct.   29   A. Correct.   20   A. Correct.   20   A. Correct.   21   A. Correct.   22   A. Correct.   23   A. Correct.   24   A. Are you - will you ask the question again.   25   A. Correct.   26   A. Are you - will you ask the question again.   27   A. Are you - will you ask the question again.   28   A. Are you - will you ask the question again.   29   A. Correct.   20   A. Correct.				-
14 Q. So if you had an eight-year-old that was required to register in Georgia for juvenile adjudication, they would have to register in Michigan?  A. Correct. That's how I understand it.  Q. And in Michigan only tier III offenses require registration for juveniles, correct?  19 questionable about the situation, then we would pass that to legal.  20 A. Correct.  21 Q. Okay. But if the — if the offense is not a tier III, if it's a return of the person would still have to register in Michigan?  22 A. Correct. They may still have to register in Michigan,  23 state requires registration, the person would still have to register in Michigan?  24 have to register in Michigan?  25 A. Correct. They may still have to register in Michigan,  26 Page 145  27 Page 146  28 Page 146  29 A. A re you — will you ask the question again.  Q. You can answer.  Q. You can answer.  30 Q. So — yeah. So when you encounter an offense that you haven't come across before and youre trying to figure out what — whether it's comparable to a Michigan offense?  30 A. No. Because they don't do that. They're just looking to see if there isn't something that already — if it's a new one, they go through legal. We don't make the obse decisions at this level. These are ones that we already had in the system that now we had to apply the new process to.  20 Q. Why do you get the police reports?  A. We try to ascertain any conviction documentation, point the offense we've never encountered before, do it's not already had not he system that are ady — if it's a new one, they go through legal. We don't make the decision at this level. These are ones that we already had in the system that now we had to apply the new process to.  Q. Let me make sure I understand this. This chart is — this isn't for — this only relates to ones that are already in the flowchart?  29 A. Correct.  Q. Why do you get the police reports?  A. We try to ascertain any conviction documentation, point the correcting and convicting documentation.  20 Q. Okay. So then you would say look, it				
register in Georgia for juvenile adjudication, they would have to register in Michigan?  A. Correct. That's how I understand it.  Q. And in Michigan only tier III offenses require registration for juveniles, correct?  A. Correct.  Q. Okay. But if the if the offense is not a tier III, if it's a tier I or tier II, but the adjudicating state requires registration, the person would still have to register in Michigan?  A. Correct. They may still have to register in Michigan, Page 145  Page 145  A. Correct. They may still have to register in Michigan, Page 146  Page 146  A. Are you will you ask the question again. Q. So yeah. So when you encounter an offense that you different conclusions about whether it's comparable to a Michigan offense?  A. No. Because they don't do that. They're just looking to see if there isn't something that already if it's a new one, they go through legal. We don't make those decisions at this level. These are ones that we already had in the system that now we had to apply the new process to. Q. Cotay. So then you would say look, it's  In this isn't for this only relates to ones that are already in the flowchart?  A. Orrect.  In the chain of - to MSP legal. Or if for some reason it just isn't makin gense to us or we just don't get comorting to it isn't in that is one only it isn't makin gense to us or we just don't determine for hose feel there's something generation.  A. Correct.  D. Who makes the decision about whether an out-of-state process is equivalent to a juvenile adjudication?  A. I'm sorry, can you ask the question again.  Q. So different states have different ways of treating juveniles of different deferal programs, things like that.  Who makes the decision that say, you know, a Georgia program is comparable to the Holmes Youthful a triance Act?  A. I'm is not learn the chome that on the state, we don't we would send it to legal to review. We don't determ				
would have to register in Michigan?  A. Correct. That's how I understand it.  Q. And in Michigan only tier III offenses require registration for juveniles, correct?  20 A. Correct.  Q. Okay. But if the — if the offense is not a tier III, if it's a tier I or tier II, but the adjudicating state requires registration, the person would still have to register in Michigan?  A. Correct.  A. Correct. They may still have to register in Michigan.  Page 145  A. Correct.  A. A correct. They may still have to register in Michigan.  Page 145  A. Correct.  A. A reyou — will you ask the question again.  Q. You can answer.  A. A reyou — will you ask the question again.  Q. So — yeah. So when you encounter an offense that you different conclusions about whether it's comparable to a Michigan offense?  A. No. Because they don't do that. They're just looking to see if there isn't something that already — if it's a new one, they go through legal. We don't make those decisions at this level. These are ones that we already had in the system that now we had to apply the new process to.  Q. Cut the make sure I understand this. This chart is — this isn't for — this only relates to ones that are already in the flowchart?  A. Correct.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?  A. Lorrect.  Q. Why do you get the police reports?				
17 A. Correct. That's how I understand it.  18 Q. And in Michigan only tier III offenses require 19 registration for juveniles, correct? 20 A. Correct. 21 Q. Okay. But if the — if the offense is not a tier III, 22 if it's a tier I or tier II, but the adjudicating 23 state requires registration, the person would still 24 have to register in Michigan? 25 A. Correct. They may still have to register in Michigan, 26 Page 145  1 Foundation. 27 Page 145  1 A. Correct. 2 BY MS. AUKERMAN: 3 Q. You can answer. 4 A. Are you — will you ask the question again. 5 Q. So — yeah. So when you encounter an offense that you haven't come across before and you're trying to figure 2 out what — whether it's comparable to a Michigan offense, do different conclusions about whether it's comparable to a Michigan offense, do different conclusions about whether it's comparable to a Michigan offense, do different conclusions about whether it's comparable to a Michigan offense, do different analysts sometimes come to different conclusions about whether an out-of-state process is equivalent to a juvenile adjudication? 4 A. Ter you — will you ask the question again. 5 Q. So — yeah. So when you encounter an offense that you offense, do different analysts sometimes come to different conclusions about whether an out-of-state process is equivalent to a juvenile adjudication? 4 A. If morry, can you ask the question again. 5 Q. So different states have different ways of treating juveniles of — different deferral programs, things like that. 6 Who makes the decision about whether an out-of-state process is equivalent to a juvenile adjudication? 6 juveniles of — different states have different ways of treating juveniles of — different states have different ways of treating juveniles of — different deferral programs, things like that. 7 Who makes the decision that say, you know, a Georgia program is comparable to the Holmes Youthful trainee Act? 8 Who makes the decision that say, you know, a Georgia program is comparable to the Holmes Youthful trainee Ac				* *
18   Q. And in Michigan only tier III offenses require registration for juveniles, correct?   19   questionable about the situation, then we would pass that to legal.   Q. Okay. But if the if the offense is not a tier III, 21   Q. Okay. But if the if the offense is not a tier III, 22   if if it's a tier I or tier II, but the adjudicating 23   state requires registration, the person would still 24   have to register in Michigan?   24   is?   A. Correct. They may still have to register in Michigan, 25   A. Correct. They may still have to register in Michigan, 26   Page 146   A. Correct.   Q. Who makes the decision about whether an out-of-state process is equivalent to a juvenile adjudication?   A. Are you will you ask the question again.   Q. So different states have different ways of treating juveniles of - different deferal programs, things like that.   Who makes the decision that say, you know, a Georgia program is comparable to the Holmes Youthful Trainee Act?   A. No. Because they don't do that. They're just looking 12 to see if there isn't something that already if 12 already had in the system that now we had to apply the new process to.   16 already had in the system that now we had to apply the new process to.   16 already in the flowchart?   19 already in the flowchart?   19 already in the flowchart?   19 A. Correct.   20 Why do you get the police reports:   20 Why do you get the police reports:   21 A. Correct.   22 A. Correct.   23 don't be understand this. This chart is this isn't for this only relates to ones that are already in the flowchart?   19 A. Just sometimes come across in some of the convicting documentation.   21 convicting documentation.   22 convicting documentation.   23 convicting documentation.   24 convicting documentation.   25 convicting documentation.   26 convicting documentation.   27 convicting documentation.   28 convicting documentation.   28 convicting documentation.   28 convicting documentation.   28 convicting documentation.   29 convicting documentatio		· ·		•
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	21	Q. Okay. So then you would say look, it's	21	of the convicting documentation.
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25 flowchart, correct? 25 allegations in the documents are?	25	flowchart, correct?	25	allegations in the documents are?
7 140		5 145		5 140
Page 147 Page 148		Page 147		Page 148

1 A. I don't – Leart answer that. I don't know 2 MS. ALKERNAN: Let I slook at another 3 decument here. This is going to be the PACC code 4 table. This is Fethbit 10. 5 MARKED FOR DENTIFICATION: 6 DEPOSITION EXHIBIT 10 1 1.38 p.m. 8 BY MS. ALKERNAN: 9 Q. Do you recognize this document? 10 A. I don't see anything yet. 11 Q. I apologize. Can you see that now. Do you recognize this document? 12 this document? 13 A. Yes. 14 Q. Okay. And can you explain how – what this is – is 15 — let me stop. 16 Can you fell us what this is? 17 A. This is what populates our fer table, what do you mean by that? 19 A. The crime codes that are in MSOR, this is how we – we communicate them. We get information. Like if there was a sinitar – strilline offense, then if we got information from legal saying that it was, we would fill this out. We would send it no are vendor. And 24 miles for them the wendor would use this to add it to the tier 10 Page 149  11 circumstantial – not circumstantial – but it could be circumstances that need to be reviewed by them. 12 Q. So but you're saying is there's some offenses where you can't tell from the language of the statute whether or not a person is left, lief II, fief III, and so they're going to have to be individually reviewed? 15 Q. A. That is any best question of the search blank. What does that mean? 16 A. This is what populates our remote. And 24 whether on not a person is first, lief II, fief III, and so they're going to have to be individually reviewed? 15 Can you fell us what this is? 16 Can you fell us what this is? 17 A. That is any best on the region of the sea of the reviewed by them. 18 A. This is what populated whether string on line fifty seen an whole bunch of Alabama offenses that there was comparable to the right of it? 15 A. Can you click the arrow, please, the fifter. 16 Can you click the arrow, please, the fifter. 17 C. Idon't know that it can because I don't have the passwords to go in. But you can kind of see that it's blank. 18 A. They're not all blank. 19 C. Okay. And then				
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8 BY MS. AUKERMAN: 9 Q. Do you recognize this document? 1 A. I don't see anything yet. 11 Q. Tapologize. Can you see that now. Do you recognize this document? 13 A. Yes. 14 Q. Okay. And can you explain how – what this is – is – let me stop. 16 — Can you rell us what this is? 17 A. This is what populates our tier table, what do you mean by that? 19 — Mee time stop. 20 A. The crime codes that are in MSOR, this is how we – we communicate them. We get information. Like if there was a similar – similar offense, then if we got information from legal saying that it was, we would fill this out. We would send it to our vendor. And then the vendor would use this to add it to the tier  Page 149  1 circumstantial – not circumstantial – but it could be be circumstantial – but it could be circum	6	DEPOSITION EXHIBIT 10	6	already encountered. We've already determined whether
9 Q. Do you recognize this document? 10 A. I don't see anything yet. 11 Q. I apologize. Can you set that now. Do you recognize this document? 12 this document? 13 A. Yes. 14 Q. Okay. And can you explain how – what this is – is – let me stop. 16 Can you tell us what this is? 17 A. This is what populates our tiet table in MSOR. 18 Q. When you say populates our tiet table in MSOR. 19 mean by that? 20 A. The crime codes that are in MSOR, this is how we – we communicate them. We get information firm legal saying that it was, we would fill this out. We would send it to our vendor. And then the vendor would use this to add it to the tier Page 149  1 circumstantial – not circumstantial – but it could be circumstances that need to be reviewed by hear. 2 Q. So like for all these we have here starting on line fifty-seven a whole bunch of Alabama offenses that there's no tier level for. So those would not yet have been reviewed by legal? 2 A. That so my best guess. 3 Q. So what you're saying is there's some offenses where you cant tell from the language of the statute whether on not a person is tier I, tier II, tier III, and so they're going to have to be individually reviewed? 3 Q. Okay. So then there's column O, it says publish single offense. What does that mean? 4 Q. Okay. And then there's a column here for approved by MSP legal. What does that mean? 4 A. That they only have to have one offense and they're published. 4 Q. Okay. And then there's a column here for approved by MSP legal. What does that mean? 4 A. That they only have to have one offense and they're published. 4 Q. Okay. And then there's a column here for approved by MSP legal. What does that mean? 5 A. Again, it has the bene determined. 5 A. Can you click the arrow, please, the filter. 6 Q. Okay. So then there's column offense swhere you can't tell from the language of the statute whether on not a person is tier I, tier II, tier III. 5 A. That they only have to have one offense and they're published. 6 Q. Okay. So then there's column here for approved by M	7	1:38 p.m.	7	it's published, their tier, you know, based on
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visita NCIC regarding the — it being the type of sex offense.  11	9		9	Q. What does CRR mean?
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13 A. Yes.  14 Q. Okay. And can you explain how – what this is – is  15 — let me stop.  16 Can you tell us what this is?  17 A. This is what populates our tier table in MSOR.  18 Q. When you say populates our tier table in MSOR.  19 When you say populates our tier table, what do you mean by that?  20 A. The crime codes that are in MSOR, this is how we – we communicate them. We get information. Like if there was a similar – similar offense, then if we got information from legal saying that it was, we would a fill this out. We would send it to our vendor. And then the vendor would use this to add it to the tier  22 page 149  1 circumstantial – not circumstantial – but it could be circumstances that need to be reviewed by them.  3 Q. So like for all these we have here starting on line in fifty-seven a whole bunch of Alabama offenses that there's no tier level for. So those would not yet have been reviewed by legal?  4 A. Thus saying they probably have been reviewed by legal, but because of the way the statute is written, it may need to be something reviewed each time. It's not or that.  2 Q. So khat you're saying is there's some offenses where you can't tell from the language of the statute whether or not a person is tier l. tier II, tier III, and so they're going to have to be individually reviewed?  2 A. That is my best guess.  18 A. Correct.  19 Q. Okay.  20 A. I'm out the each of the earth of the e	11	Q. I apologize. Can you see that now. Do you recognize	11	within NCIC regarding the it being the type of sex
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17 A. This is what populates our tier table in MSOR. 18 Q. When you say populates our tier table, what do you any populates our tier table, what do you are may by that? 20 A. The crime codes that are in MSOR, this is how we - we communicate them. We get information. Like if there was a similar - similar offense, then if we got information from legal saying that it was, we would fill this out. We would send it to our vendor. And then the vendor would use this to add it to the tier 25 by a circumstantial - not circumstantial - but it could be circumstances that need to be reviewed by them. 29 Q. So like for all these we have here starting on line fifty-seven a whole bunch of Alabama offenses that there's no tier level for. So those would not yet fave be nevelewed by legal? 30 A. The masning they probably have been reviewed by legal. 41 A. The yeins all blank. 42 C. So like for all these we have here starting on line fifty-seven a whole bunch of Alabama offenses that there's no tier level for. So those would not yet should be circumstances that use wither it may need to be something reviewed each time. It's not something we can just say it's always going to be this or that. 42 Q. So what you're saying is there's some offenses where you can't tell from the language of the statute whether or not a person is tier I, tier III, the III, and so they're going to have to be individually reviewed? 42 Q. Okay. So then there's column 0, it says publish single offense. What does that mean? 43 A. Again, it hasn't been determined. 44 Q. Okay. And then there's column here for approved by MSP legal. What does that mean? 45 MSP legal. What does that mean? 46 MSP legal. What does that mean? 47 A. That they only have to have one offense and they're published. 48 Determined the published in the publish of the published. 49 Colony, and then if the publish of the published in the publish of the published. 40 Colony, and the comparable Michigan code, what is that column supposed to be for? 41 A. That they only have to have one offense a	15	let me stop.	15	A. Correct.
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38 (Pages 149 to 152)

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13 A. No. But whatever the tier is, is how we kind of figure it out. Obviously, if it's another state and they're not using tiers or something, we don't look at that.  16 that.  17 Q. So how do I – how would I figure out what – let's take – I don't know. Here, let's just take value is take – I don't know. Here, let's just take – I don't know. Here is aying boor document.  18 A. No RukerMan: Page 153  19 about whether or not she needs a break, that's totally permissible. We'd like to take ten minute and we'll recovene at 2:00.  10 about whether or not she needs a break, that's totally permissible. We'd like to take ten minute and we'll recovene at 2:00.  11 about whether or not she needs a break, that's totally permissible. We'd like to take ten minute and we'll recove	11	in MSOR.	11	MR. JAMISON: Objection, vague.
14 figure it out. Obviously, if it's another state and they're not using iters or something, we don't look at that. 15 that. 16 that. 17 Q. So how do I — how would I figure out what — let's take — I don't know. Here, let's just take — D.C., 18 stake — I don't know. Here, let's just take — D.C., 19 second degree child abuse, tier III; how do I know what the comparable Michigan offense is? Where is that — where's that kept? 22 A. We don't keep that. I don't know. We don't keep that. 23 Q. Does anybody keep that? 24 Q. Does anybody keep that? 25 A. Not that I'm aware of. 26 Page 153 27 A. Not that I'm aware of. 28 MS. AUKERMAN: That's fine. 29 MS. AUKERMAN: That's fine. 30 MS. AUKERMAN: That's fine. 31 reconvene at 2:00. 32 MR. JAMISON: Do you have any idea how much longer you're going to need? 33 mR. JAMISON: Do you have any idea how much longer you're going to need? 44 MS. AUKERMAN: Hinkik we're going to need the rest of the day. 45 MS. AUKERMAN: You're going to take the full seven hours? 46 MR. JAMISON: You're going to take the full seven hours? 47 MS. AUKERMAN: You're going to take the full seven hours? 48 MR. JAMISON: You're going to take the full seven hours? 49 MS. AUKERMAN: Hinkik we're going to need? 40 Just a couple more questions. 40 A. Ornet. 41 Q. The unit does predeterminations for law enforcement, correct? Like for an out-of-state registry? 42 A. Thin to sar we provide minations for law enforcement, correct? Like for an out-of-state registry? 43 A. Thin that's just to the re it says that in the — this we're now on page Bates 776. It says that there's no predeterminations made, correct, for	12	Q. Does MSOR have a field for comparable offense?	12	BY MS. AUKERMAN:
that.  15	13	A. No. But whatever the tier is, is how we kind of	13	Q. You can answer.
that.  Q. So how do I — how would I figure out what — let's sake — I don't know. Here, let's just take — D.C., second degree child abuse, tier III; how do I know what the comparable Michigan offense is? Where is that — where's that kept?  A. We don't keep that. I don't know. We don't keep that. I don't know. We don't keep that.  Q. Does anybody keep that?  Q. Does anybody keep that?  A. Not that I'm aware of.  Page 153  A. Not that I'm aware of.  Page 154  1 about whether or not she needs a break, that's totally permissible. We'd like to take ten minute and we'll reconvene at 2:00.  MR. JAMISON: Do you have any idea how much longer you're going to need?  MR. JAMISON: Do you have any idea how much longer you're going to need?  MR. JAMISON: Do you have any idea how much longer you're going to need?  MR. JAMISON: Do you have any idea how much longer you're going to need?  MR. JAMISON: Do you have any idea how much longer you're going to need?  MR. JAMISON: Do you have any idea how much longer you're going to need?  MR. JAMISON: Do you have any idea how much longer you're going to need?  MR. JAMISON: Do you would make — based on out-of-state conviction, you would m	14	figure it out. Obviously, if it's another state and	14	<b>A.</b> I'm not sure of your question.
17 Q. So how do I – how would I figure out what – let's take – I don't know. Here, let's just take – D.C., as coord degree child abuse, titer III; how do I know what the comparable Michigan offense is? Where is that – where's that kept?  21 A. We don't keep that. I don't know. We don't keep that.  22 A. We don't keep that I don't know. We don't keep that.  23 that.  24 Q. Does anybody keep that?  25 A. Not that I'm aware of.  26 Page 153  1 about whether or not she needs a break, that's totally permissible. We'd like to take ten minute and we'll recorvene at 2:00.  28 MR. JAMISON: That's fine.  29 MR. JAMISON: Do you have any idea how much longer you're going to need?  29 MR. JAMISON: Do you have any idea how much longer you're going to need?  20 M. S. AUKERMAN: I think we're going to need the rest of the day.  21 MR. JAMISON: You're going to take the full seeven hours?  22 MR. JAMISON: You're going to take the full see how it's – let's off the record.  23 MR. JAMISON: You're going to take the full see how it's – let's off the record.  24 (Off the record 1:48 p.m.)  25 MS. AUKERMAN: Yes, I am, likely. We'll see how it's – let's off the record.  26 (Off the record 1:48 p.m.)  27 MS. AUKERMAN: I think we're going to record in the documents that you don't do predeterminations, is that correct?  28 A. That was a new process change. So the only ones we do that for are like ICOTS and MDOC, which is the transfer.	15	they're not using tiers or something, we don't look at	15	Q. Okay. Let's go back to the prior document.
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39 (Pages 153 to 156)

1	raciatranta?	1 that is there a role for the registrant's attenues in
2	registrants?  A. Uh-huh.	that, is there a role for the registrant's attorney in determining what is substantially similar?
3		,
4	Q. And that there are predeterminations made for the MDOC	Trr
5	or for a court, correct?	4 anything that the registrant or attorney can do to 5 say, you know, I don't think it's substantially
6	A. Correct.	
7	Q. Okay. And then the highlighted language here says the	
8	offender shall be provided with the resources needed	l second of the
9	to make the determination. What resources are	8 A. So I have actually had that happen, and I've referred
10	provided to registrants moving in out of state to make	9 to legal, MSP legal.
	that determination?	Q. So the registrant or their attorney would need to
11 12	A. Referencing the state statute, the registrable	11 contact MSP legal?
	offenses.	12 <b>A.</b> No. They don't contact them, they contact us. The
13	Q. So the registrant will be told you can look at your	attorney, if they have issue with it, they contact us.
14	out-of-state conviction and you can look at the	And we can tell them that we can refer to our legal
15	Michigan conviction and	for a review. But typically that's after they have
16	A. And consult an attorney.	16 already been determined a certain tier.
17	Q. And consult an attorney. But they're not provided	Q. But if the registrant's attorney says I disagree, I
18	with the chart	think this is tier II and not tier III, what happens?
19	A. No.	19 <b>A.</b> For someone who's already registered?
20	Q or anything like that?	Q. Yeah. The person has been registered and told you're
21	So they would have to try to figure out	21 tier III and the attorney says no, I think this is
22	themselves whether something is substantially similar	more comparable to a tier II offense, what happens?
23	to a Michigan offense, correct?	A. They usually send something to our group email and we
24	A. I guess correct, yes.	advise them that we are forwarding to legal for
25	Q. All right. Let's talk about one last question on	25 review.
	Page 157	Page 158
-	0. 70.1. A 14. 191. 1	
1	Q. Right. And then if legal says nope, we think this	that be considered substantially similar to kidnapping
2	person is a tier III, what happens?	2 in Michigan? 3 A. If it I would follow the typical rule. If for some
3	A. I don't know. That usually we respond. I haven't	The second secon
4	had anything come back. I've only had that experience	4 reason that's something that we are directed to start
5	once.	5 addressing, we would address it.
6	O Olyay I at a tally shout the non-say offense asses	1
6	Q. Okay. Let's talk about the non-sex offense cases.	6 Q. Okay. So you're familiar with the Michigan Court of
7	Are you familiar with registration requirements for	6 Q. Okay. So you're familiar with the Michigan Court of 7 Appeals called People v. Lymon, correct?
7 8	Are you familiar with registration requirements for people who are not convicted of a sex offense?	6 Q. Okay. So you're familiar with the Michigan Court of 7 Appeals called People v. Lymon, correct? 8 A. Correct.
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7 8 9 10 11	Are you familiar with registration requirements for people who are not convicted of a sex offense?  A. Somewhat. Q. Can you describe what you know.  MR. JAMISON: Objection, vague.	6 Q. Okay. So you're familiar with the Michigan Court of 7 Appeals called People v. Lymon, correct? 8 A. Correct. 9 Q. What's happening in response to Lymon within the SOR 10 unit? 11 A. As we've been directed, we are providing communication
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40 (Pages 157 to 160)